

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA  
Plaintiff,  
  
vs.  
ROBERTO SANTOS RODRIGUEZ  
Defendant

Crim. No. 99-183(SEC)

**DEFENDANT'S MOTION FOR CONTINUANCE OF REVOCATION HEARING**

TO THE HONORABLE SALVADOR E. CASELLAS  
UNITED STATES SENIOR JUDGE  
FOR THE DISTRICT OF PUERTO RICO

COMES NOW the Defendant, Roberto Santos Rodriguez, represented by the Federal Public Defender for the District of Puerto Rico, and very respectfully STATES and PRAYS as follows:

That a revocation hearing has been set for July 10, 2008.

That the defendant has been detained since May 16, 2008. Although the undersigned attorney had attempted to meet Mr. Santos on three separate occasions, the efforts were fruitless inasmuch as Mr. Santos was on separation and would not be brought to the visiting area. Finally, two weeks ago, on the third attempt to visit him, personnel from MDC-Guaynabo informed that the defendant had been transferred to unit 4-C. The undersigned attorney was able to talk to Mr. Santos last week. In light of this meeting as well as information found in the case docket and provided by defendant's relatives, the undersigned attorney filed a motion requesting an order to MDC-Guaynabo to produce Mr. Santos medical records. See docket no. 224.

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The undersigned attorney would not have the medical records in time for the revocation hearing. The defendant's medical history is a significant component of the defendant's history and characteristics. Hence, those records would assist the defendant in mitigation of punishment if the court finds that revocation of his supervised release is warranted. Therefore, the defendant moves this court for a short continuance of the revocation hearing, allowing undersigned attorney with additional time to examine the defendant's medical records once they are provided by U.S. Bureau of Prisons.

That on this day the undersigned counsel contacted Assistant United States Attorney Antonio Bazan regarding the foregoing request, and he has no objection to a continuance of the revocation hearing.

WHEREFORE, for the above-mentioned reasons, the Defendant respectfully requests an order granting the foregoing request, continuing the revocation hearing for ten (10) days.

I hereby certify that on July 8, 2008 I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the parties of record.

RESPECTFULLY SUBMITTED.

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In San Juan, Puerto Rico, 8<sup>th</sup> of July, 2008.

**JOSEPH C. LAWS, JR.**  
**FEDERAL PUBLIC DEFENDER**

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